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UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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IN RE:

15 JOHN CORP.,
a/k/a LES HALLES,
a/k/a FIRST ADMIN INC.

Case No.:
Chapter 11 Reorganization

**DECLARATION PURSUANT TO
LOCAL RULE 1007**

Debtor.

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STATE OF NEW YORK)

ss.:

COUNTY OF NEW YORK)

PHILIP LAJAUNIE declares under penalty of perjury:

1. I, Philip Lajaunie, am a 100% equity owner of the above Debtor, am the President of the above Debtor, a New York corporation located at its offices at 15 John Street, New York, New York 10038. This affidavit is submitted by the Debtor-in-Possession, pursuant to the Local Rules of this Court, in connection with filing of a Chapter 11 case by the above Debtor.

2. The Debtor is not a small business debtor within the meaning of the Bankruptcy Code.

3. The Debtor is in the business of owning and operating 15 John Street, New York, New York 10038, a well known restaurant in the New York City area serving celebrities and well connected and fashion related clientele. The Debtor originally opened its doors in 1998 at the subject premises. I have been involved in the restaurant business for 30 years on having operated well know restaurants such Les Halles (a total of six (6) restaurant chain operating in the United States and Japan). I operated over 20 restaurants in various locales over these 30

years. I am well known in the industry. First Admin Inc. is the entity that provides other administrative services for 15 John Corp. by arranging to issue disbursements and other expenses for 15 John Corp.

4. This Petition is filed to forestall the substantial and different litigation which had been commenced in or about 2012 by former employees of the Debtor who had been incited to seek inflated and unwarranted compensatory and punitive damages in various class actions. The litigation commenced with one employee and gradually increased in size until today where there are approximately several hundred employees represented in a Class Action. This litigation is pending in the United States District Court for the Southern District of New York. Recently the litigation had resulted in a default judgment alleged against the Defendant which resulted in an inquest on damages scheduled to be heard on November 9, 2016. The Debtor has expended substantial and significant funds in attorney's fees and other costs to defend this litigation. The Debtor intends to challenge this default judgment.

5. In the meantime, the employees represented in the litigation are no longer employed by the Debtor.

6. There is no unsecured creditors committee or other committee of creditors.

7. The Debtor does not have any other creditors other than the ones identified here.

8. Expected receipts and disbursements for the next 30 days is attached as Exhibit A summary of the debtor's assets and liabilities are attached as Exhibit B.

9. I have served as President of the Debtor since its inception of the Debtor and own 100% of the equity of the Debtor. There are no other officers of the Debtor.

10. No property is within the possession of any party other than the Debtor.

11. The Debtor leases the Subject Premises, which is approximately 3,200 square feet

under extension agreement extending the Lease dated June 1, 1997 up until December 31, 2019 at a present monthly rent of \$32,000. The Debtor is in default and an Eviction Action had been commenced and which is pending in the New York Civil Court. No Warrant of Eviction has been issued. There is approximately \$125,000 alleged by the landlord to be due.

12. The Debtor's books and records are maintained by the Debtor.

13. I am the only officer of the Debtor. Prior to May 2016, I had a salary of approximately \$12,000 but have not taken that salary since at least May 2016. I have committed to deferring any salary in connection with my services up until a confirmation of a Plan of Reorganization.

14. The Debtor believes that it will be able to negotiate a settlement with its creditors and propose a viable and confirmable Plan of Reorganization, to deal with the litigation creditors, the Debtor's accounts payable and the Debtor's landlord under a Plan combining the Debtor's proven ability to generate cash flow from the Debtor's operations, as well as from my own sources of funds.

Duly declared under penalty of perjury:
August 24, 2016



Name: Philip Lajthum
Title: President

EXHIBIT A
Expenses and Income 30 days

	Restaurant Income			
Expected Monthly	Approximately \$90,000			
Expenses	Approximately \$85,000			

Fill in this information to identify the case:

Debtor name 15 JOHN CORP., a/k/a LES HALLES, a/k/a FIRST ADMIN INC.
United States Bankruptcy Court for the: Southern District of New York
(State)
Case number (if known): 16-12453 (MEW)

☐ Check if this is an amended filing

Official Form 204

Chapter 11 or Chapter 9 Cases: List of Creditors Who Have the 20 Largest Unsecured Claims and Are Not Insiders

12/15

A list of creditors holding the 20 largest unsecured claims must be filed in a Chapter 11 or Chapter 9 case. Include claims which the debtor disputes. Do not include claims by any person or entity who is an *insider*, as defined in 11 U.S.C. § 101(31). Also, do not include claims by secured creditors, unless the unsecured claim resulting from inadequate collateral value places the creditor among the holders of the 20 largest unsecured claims.

	Name of creditor and complete mailing address, including zip code	Name, telephone number, and email address of creditor contact	Nature of the claim (for example, trade debts, bank loans, professional services, and government contracts)	Indicate if claim is contingent, unliquidated, or disputed	Amount of unsecured claim		
					Total claim, if partially secured	Deduction for value of collateral or setoff	Unsecured claim
1	Rewards Network	Patricia Bunkley (312) 521-6772 pbunkley@rewardsnetwork.com					\$651,431.68
2	Mott & Prince Management Inc.						\$179,635.61
3	American Express	20022 N. 31st Avenue Phoenix, Arizona 85027 Leann Tyler (623) 492-5449 Leann.G.Tyler@aexp.com					\$164,437.17
4	La Boucherie						\$57,513.61
5	Les Halles Group Corp.						\$51,209.89
6	Harry Block as Attorney						\$47,310.60
7	Yoko Iizuka						\$31,259.74
8	Kaufman Dolowich Voluck & Gonzo LLP						\$28,351.01

Name

Name of creator and complete mailing address, including zip code: